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December 7, 2000

### VIA HAND DELIVERY

D. David Waddell **Executive Secretary** Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243-0505

Re:

Joint Application of the City of Kingsport and Tengasco Pipeline Corporation for Approval of City Resolution and City Ordinance;

Docket No. 00-00537

Dear Mr. Waddell:

Enclosed you will find the original and thirteen copies of the responses to the supplemental data requests of the TRA staff, dated December 4, 2000, in the above referenced docket.

Sincerely,

D. Billye Sanders

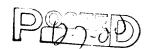
D. Bellige Sanders

DBS/lmb **Enclosures** 

Joe Conner, Esq.

J. Michael Billingsley, Esq.

Cary Sorensen, Esq.



# BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

		<u> </u>
IN RE:  JOINT APPLICATION OF THE CITY OF KINGSPORT AND TENGASCO PIPELINE CORPORATION FOR APPROVAL OF CITY RESOLUTION	)	
	) ) )	Docket No. 00-00537
TENGASCO PIPELINE CORPORATION'S a  TO SUPPLEMENTAL TENNESSEE REGULATO	QUES'	TIONS OF THE

Following are Tengasco Pipeline Corporation's and the City of Kingsport's answers to the supplemental questions of the Tennessee Regulatory Authority staff which were filed on December 4, 2000 in order to assist the Authority in its consideration of the Joint Application of the City of Kingsport and Tengasco Pipeline Corporation for Approval of City Resolution.

1. Please provide information that would support your contentions that the right granted to Tengasco in Kingsport City Resolution No. 2000-092 "is necessary and proper for the public convenience and properly conserves the public interest." (See Tenn. Code Ann. §65-4-107).

#### ANSWER:

Information supporting the conclusion that Resolution No. 2000-092 is necessary and proper for the public convenience and properly conserves the public interest as stated in T.C.A. §65-4-107 has previously been supplied in response to question 7 of the staff's initial data requests. See also the letter, dated April 26, 2000, attached to the response to initial data request no. 1, regarding the need to construct the facilities to deliver gas to Eastman Chemical Company. At the time that the December 4, 2000 data requests were issued, the staff had not yet seen the responses to the initial data requests.

2. Please state whether, and to what extent, the Joint Stipulation filed on December 1, 2000 is interpreted by the parties as authorizing actual utility service, and not simply construction of a pipeline by Tengasco..

#### ANSWER:

It is the position of Tengasco Pipeline Corporation and the City of Kingsport that the Joint Stipulation withdraws any objection by United Cities Gas Company to approval of the resolution, except Paragraph 3 on page 2 of the resolution. The resolution itself expressly states that transportation is required and that construction necessary to provide the transportation is authorized; thus, the stipulation supports and authorizes the specific transportation utility service which is the subject of the resolution.

#### BY ATTORNEYS:

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## **CERTIFICATE OF SERVICE**

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